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FN U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

DOUGLAS A. LINDE, ESQ. (SBN 217584)
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Attorneys for Plaintiffs,
LA PRINTEX INDUSTRIES, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LA PRINTEX INDUSTRIES, INC.

Plaintiffs,

v.

FOREVER 21, INC.; RAVIYA, INC.;
and DOES 1 through 10, inclusive,

Defendants.

Case No.

CV09-7537 CT

COMPLAINT FOR COPYRIGHT
INFRINGEMENT

DEMAND FOR JURY TRIAL

COMES NOW, PLAINTIFF LA PRINTEX INDUSTRIES, INC. ("Plaintiff" or "LA Printex") and complains of and alleges the following:

INTRODUCTION AND OVERVIEW

1. As shown by the design and garment attached as Exhibits to this Complaint, this is a clear liability copyright infringement case, wherein Defendants, engaged in advertising activity, including but not limiting to, making garments featuring nearly identical copies of Plaintiff's copyright protected designs and selling them to

1 and/or through, inter alia, Forever 21 retail stores as their own, causing significant
2 advertising injury to Plaintiff. If successful, Plaintiff seeks recovery of all remedies
3 available under law including but not limited to its damages, all of Defendants profits,
4 and payment of Plaintiff's attorneys fees and costs.
5

6 **JURISDICTION AND VENUE**

7 2. This Court has federal question jurisdiction under 28 U.S.C. §§ 1331,
8 1338(a).

9 3. The claims asserted herein arose in this judicial district and all Defendants
10 do business in this judicial district.

11 4. Venue in this judicial district is proper under 28 U.S.C. § 1391(b) and (c)
12 and 1400(a) in that this is the judicial district in which a substantial part of the acts and
13 omissions giving rise to the claims occurred.
14

15 5. This is an action for copyright infringement under the Copyright Act of
16 1976, Title 17 U.S.C. § 101 et seq., seeking damages, attorneys' fees, preliminary and
17 permanent injunctive relief and an accounting, as well as damages and other relief
18 based upon other claims related to the misappropriation of Plaintiff's intellectual
19 property.

20 **PARTIES**

21 **The Plaintiff**

22 6. Plaintiff LA Printex Industries, Inc., is a corporation organized and
23 existing under the laws of the State of California with its principal place of business at
24 3270 E. 26th Street, Vernon, California. It is citizen of the State of California.

25 **The Defendants**

26 7. Plaintiff is informed and believes and thereon alleges that Defendant
27 FOREVER 21, INC. is a corporation organized and existing under the laws of the State
28 of Delaware with its principal place of business in California at 2001 S. Alameda Street,

1 Los Angeles, CA 90058. Plaintiff is informed and believes and thereon alleges that
2 Defendant FOREVER 21, INC. is in the business of selling garments through retail
3 stores.

4 8. Plaintiff is informed and believes and thereon alleges that RAVIYA, INC.
5 is a corporation organized and existing under the laws of the State of California with its
6 principal place of business in California at 2614 S. Grand Avenue, Los Angeles, CA
7 90007. Plaintiff is informed and believes and thereon alleges that RAVIYA, INC. is in
8 the business of designing, manufacturing, assembling and/or distributing garments.

9 9. Plaintiff is informed and believes and thereon alleges that Defendants
10 DOES 1 through 10, inclusive, created, assembled, distributed, manufactured and/or
11 sold garments comprised of fabric printed with Plaintiff's copyrighted Subject Designs
12 (as hereinafter defined) or that have otherwise contributed to the infringement of
13 Plaintiff's copyrighted Subject Designs. The true names and capacities, whether
14 corporate, individual or otherwise, of the Defendant DOES 1 through 10, inclusive, are
15 unknown to Plaintiff who therefore sues said Defendants by such fictitious names, and
16 will ask leave to amend this Complaint to show their true names and capacities when
17 the same have been ascertained.
18

19 10. Plaintiff is informed and believes and thereon alleges that at all times
20 relevant hereto, each of the Defendants, including without limitation the DOE
21 Defendants, was the agent, affiliate, officer, director, manager, principal, partner, joint
22 venturer, alter-ego and/or employee of the remaining Defendants and was at all times
23 acting within the scope of such agency, affiliate, officer, director, manager, principal,
24 partner, joint venturer, alter-ego and/or employment relationship and actively
25 participated in, or subsequently ratified and adopted, or both, each and all of the acts or
26 conduct alleged herein, with full knowledge of all the facts and circumstances,
27 including, but not limited to, full knowledge of each and all of the violations of
28 Plaintiff's rights and the damages to Plaintiff proximately caused thereby.

CLAIM FOR RELIEF

COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 101 ET SEQ.

(Against All Defendants and Each of Them)

11. Plaintiff repeats, realleges and incorporates by reference in this paragraph the allegations contained in this Complaint as if fully set forth herein.

12. This is a clear-cut case supported by irrefutable evidence of copyright infringement.

13. Plaintiff is a textile vendor that develops original designs that it sells exclusively to its customers.

14. Plaintiff developed original artwork which was assigned internal design number D-40255 and D-40464 ("Subject Designs"). Plaintiff applied for and received copyright registrations for the Subject Designs. The Subject Designs contain materials wholly original with Plaintiff and is copyrightable subject matter under the laws of the United States. A true and correct copy of Plaintiff's original D-40255 design and copyright registration certificate are attached hereto as Exhibit 1.

15. A true and correct copy of Plaintiff's original D-40464 design and copyright registration certificate are attached hereto as Exhibit 2.

16. Plaintiff is informed and believes and thereon alleges that Defendants including all DOE Defendants, their customers and suppliers and each of them, had access to the Subject Designs, including without limitation: (a) access through Plaintiff's showroom; (b) access through illegal copies; (c) access through strike-offs and samples from Plaintiff; (d) access through their customers and or suppliers, and/or (e) access through garments bearing the Subject Designs sold by other retailers.

17. Plaintiff is informed and believes, and thereon alleges, Defendants wrongfully created copies of the copyrighted Subject Designs without Plaintiff's consent and engaged in acts of affirmative and widespread self-promotion of the copies directed to the public at large by distributing said copies (and accompanying written

1 materials) with a false and misleading designation of creation, ownership and origin,
2 and falsely representing that the Subject Designs was their own.

3 18. Plaintiff is informed and believes and thereon alleges that Defendants, and
4 each of them, further infringed Plaintiff's copyright by making derivative works from
5 Plaintiff's copyrighted Subject Designs, and/or by producing and distributing garments
6 incorporating those derivative works without Plaintiff's permission. Defendants then
7 engaged in acts of affirmative and widespread self-promotion of the copies directed to
8 the public at large by publicly claiming ownership rights in and to the derivative works
9 based on the Subject Designs that belong solely to Plaintiff.

10 19. RAVIYA, INC. offered for sale, and in fact sold, the garment attached
11 hereto as Exhibit 3.

12 20. FOREVER 21, INC. offered for sale, and in fact sold, the garment
13 attached hereto as Exhibit 3.

14 21. Plaintiff is informed and believes that RAVIYA, INC. sold garments of the
15 type attached hereto as Exhibit 3, to retailers other than FOREVER 21, INC.

16 22. Plaintiff is informed and believes that Defendants, and each of them,
17 offered for sale, and in fact sold, garments bearing pattern featured on Exhibit 3, under
18 different style numbers.

19 23. The pattern appearing on Exhibit 1 and Exhibit 2 is substantially similar to
20 the pattern appearing on Exhibit 3.

21 24. The pattern appearing on Exhibit 1 and Exhibit 2 is strikingly similar to the
22 pattern appearing on Exhibit 3.

23 25. The pattern appearing on Exhibit 1 and Exhibit 2 is nearly identical to the
24 pattern appearing on Exhibit 3.

25 26. Plaintiff is informed and believes and thereon alleges that Defendants, and
26 each of them, if not directly liable for infringement of Plaintiff's copyright, are also
27 liable for contributory copyright infringement because each Defendant knew or should
28

1 have known of the direct infringement, had the right and ability to supervise the
2 infringing conduct, and had an obvious and direct financial interest in the infringing
3 conduct.

4 27. Plaintiff is informed and believes and thereon alleges that Defendants, and
5 each of them, if not directly liable for infringement of Plaintiff's copyright, are also
6 vicariously liable for the subject infringements because each Defendant enjoys a direct
7 financial benefit from another's infringing activity and has the right and ability to
8 supervise the infringing activity.

9 28. Defendants' acts of copyright infringement and acts of affirmative and
10 widespread self-promotion of the copies directed to the public at large, as alleged
11 above, have caused Plaintiff to suffer, and to continue to suffer, substantial damage to
12 its business in the form of diversion of trade, loss of income and profits, and a dilution
13 of the value of its rights.

14 29. Further, as a direct result of the acts of copyright infringement and acts of
15 affirmative and widespread self-promotion of the copies directed to the public at large
16 alleged above, Defendants, and each of them, have obtained direct and indirect profits
17 they would not otherwise have realized but for their infringement of Plaintiff's
18 copyrighted Subject Designs. Plaintiff is entitled to disgorgement of each Defendant's
19 profits directly and indirectly attributable to said Defendant's infringement of the
20 Subject Designs.
21

22
23 **PRAYER FOR RELIEF**

24 WHEREFORE, Plaintiff prays for judgment as follows:

25 1. That Defendants, and each of them, and their respective agents and servants
26 be enjoined from infringing Plaintiff's copyright in any manner;
27
28

1 2. That Plaintiff be awarded all profits of Defendants, and each of them, plus all
2 losses of Plaintiff, the exact sum to be proven at the time of trial, or, if elected before
3 final judgment, statutory damages, as available under the Copyright Act, 17 U.S.C. §
4 101 et seq.;

5
6 3. That Plaintiff be awarded its attorneys' fees as available under the Copyright
7 Act, 17 U.S.C. § 101 et seq.;

8
9 4. That Defendants, and each of them, account to Plaintiff for their profits and
10 any damages sustained by Plaintiff arising from the foregoing acts of infringement;

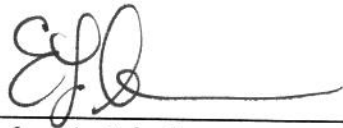
11
12 5. That Plaintiff be awarded pre-judgment interest as allowed by law;

13
14 6. That Plaintiff be awarded the costs of this action; and

15
16 7. That Plaintiff be awarded such further legal and equitable relief as the Court
17 deems proper.
18

19
20 Dated: October 12, 2009

THE LINDE LAW FIRM

21
22 By: 
23 Douglas A. Linde
24 Erica L. Allen
25 Attorneys for Plaintiff
26 LA PRINTEX INDUSTRIES, INC.
27
28

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury in this action pursuant to F.R.C.P.
38 and the Seventh Amendment of the Constitution.

Dated: October 12, 2009

THE LINDE LAW FIRM

By: _____

Douglas A. Linde

Erica L. Allen

Attorneys for Plaintiff

LA PRINTEX INDUSTRIES, INC.

Douglas A. Linde, State Bar No. 217584
 The Linde Law Firm
 9000 Sunset Blvd., Suite 1025
 Los Angeles, CA 90069
 (310) 203-9333
 (310) 203-9233 FAX

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

LA PRINTEX INDUSTRIES, INC.

PLAINTIFF(S)

v.

FOREVER 21, INC.; RAVIYA, INC.; and DOES 1
 through 10, inclusive

DEFENDANT(S).

CASE NUMBER

CV09-7537

CT

SUMMONS

TO: DEFENDANT(S): All above named Defendants

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, The Linde Law Firm, whose address is 9000 Sunset Blvd., Suite 1025, Los Angeles, CA 90069. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

SHEA BOURGEOIS

Dated: 16 OCT 2009

By: _____

Deputy Clerk

(Seal of the Court)

SEAL

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Douglas A. Linde, State Bar No. 217584
 The Linde Law Firm
 9000 Sunset Blvd., Suite 1025
 Los Angeles, CA 90069
 (310) 203-9333
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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

LA PRINTEX INDUSTRIES, INC.

PLAINTIFF(S)

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SUMMONS

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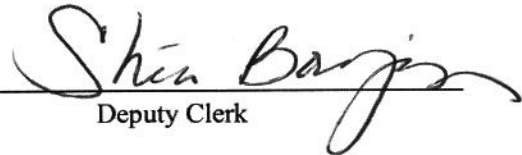
A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, The Linde Law Firm, whose address is 9000 Sunset Blvd., Suite 1025, Los Angeles, CA 90069. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 16 OCT 2009

By:



Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) LA PRINTEX INDUSTRIES, INC.	DEFENDANTS FOREVER 21, INC.; RAVIYA, INC.; and DOES 1 through 10, inclusive
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Douglas A. Linde and Erica L. Allen THE LINDE LAW FIRM 9000 Sunset Blvd., Ste. 1025, Los Angeles, CA 90069, (310) 203-9333	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.) <input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify): <input type="checkbox"/> 6 Multi-District Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
--

V. REQUESTED IN COMPLAINT: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Check 'Yes' only if demanded in complaint.) CLASS ACTION under F.R.C.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No MONEY DEMANDED IN COMPLAINT: \$ _____
--

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) Plaintiff alleges Defendants violated 17 U.S.C 101 et seq. when they manufactured and sold garments bearing Plaintiff's original, copyright protected design.
--

VII. NATURE OF SUIT (Place an X in one box only.)					
OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

CV09-7537

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
 If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
 If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Forever 21, Inc.- Los Angeles County	
Raviya, Inc.- Los Angeles County	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):

[Signature]

Date

10/12/09

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))